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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA,)	CASE NO: CR 18-533
13)	
14 Plaintiff,)	STIPULATION TO CONTINUE STATUS
15)	CONFERENCE AND ORDER
16 v.)	
17 EDVIN OVASAPYAN and HAKOB)	
18 KOJOYAN,)	
)	
Defendants.)	
)	
)	

19 The parties in this case last appeared before this Court on February 5, 2019, at which time the
20 matter was continued to May 14, 2019 for a status hearing. Since that time, the government has
21 continued to produce discovery. A substantial portion of the discovery in this case consists of
22 consensual recordings of conversations in the Armenian language, and the government has produced
23 both the recordings themselves and all available translated summaries of those conversations. Counsel
24 for Defendant Kojoyan recently requested that the government re-produce the audio recordings so that
25 they might be more easily correlated to the available translated summaries, and the government is in the
26 process of doing so. The government anticipates producing those recordings prior to the parties'
27 currently scheduled May 14, 2019 appearance. However, given the volume of those recordings in
28 addition to other newly produced (and soon to be produced) discovery, the parties agree that a

1 continuance is appropriate. A continuance of approximately 60 days will allow the defense to review
2 the voluminous discovery, and it will allow the parties to more accurately advise the Court as to
3 potential resolutions or the need for a trial date at the next appearance. The parties therefore stipulate
4 and agree that this matter should be continued to July 16, 2019, at 1:30 for a status conference.

5 The parties further stipulate and agree that an exclusion of time for purposes of the Speedy Trial
6 Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B) would be appropriate between May 14, 2019, and
7 July 16, 2019. Exclusion of time until July 16, 2019, will allow the defense to review the evidence, do
8 further investigation, and is necessary for the effective preparation of counsel. *See* 18 U.S.C. §
9 3161(h)(7)(B)(iv).

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11 IT IS SO STIPULATED.

12 DATED: May 8, 2019

/s/

ANDREW F. DAWSON
Assistant United States Attorney

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14 DATED: May 8, 2019

/s/

ALAN EISNER
Counsel for Defendant Kojoyan

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16 DATED: May 8, 2019

/s/

RICHARD MOSS
Counsel for Defendant Ovasapyan

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ORDER

The previously scheduled appearance on May 14, 2019, is hereby continued to 1:30pm on July 16, 2019. Pursuant to the parties' stipulation the Court finds that the exclusion of the period from May 14, 2019 to July 16, 2019 from the time limits applicable under 18 U.S.C. § 3161 is warranted; that the ends of justice served by the continuance outweigh the interests of the public and the defendant in the prompt disposition of this criminal case; and that the failure to grant the requested exclusion of time would deny counsel for the defendant and for the government the reasonable time necessary for effective preparation and of counsel, taking into account the exercise of due diligence, and would result in a miscarriage of justice. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: May 8, 2019


HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE